

ZTT Compliance Rules on Compliance Audit

CHAPTER I. General Provisions

Article 1.

		Company
ZTT	Applicable Laws	
	ZTT Compliance Policies	

Article 2.

“Subsidiaries

Article 3.

- (1) Compliance**
- (2) Compliance Risks**
- (3) Appropriate Compliance Department**
- (4) Business Department**
- (5) Internal Audit**
- (6) Cross-audit**

Article 4.

CHAPTER II. Compliance Audit Procedure

Article 5.

IRU UHF

Article 6.

Article 8.

(1)

(2)

(3)

Article 9.

Article 10.

Article 11.

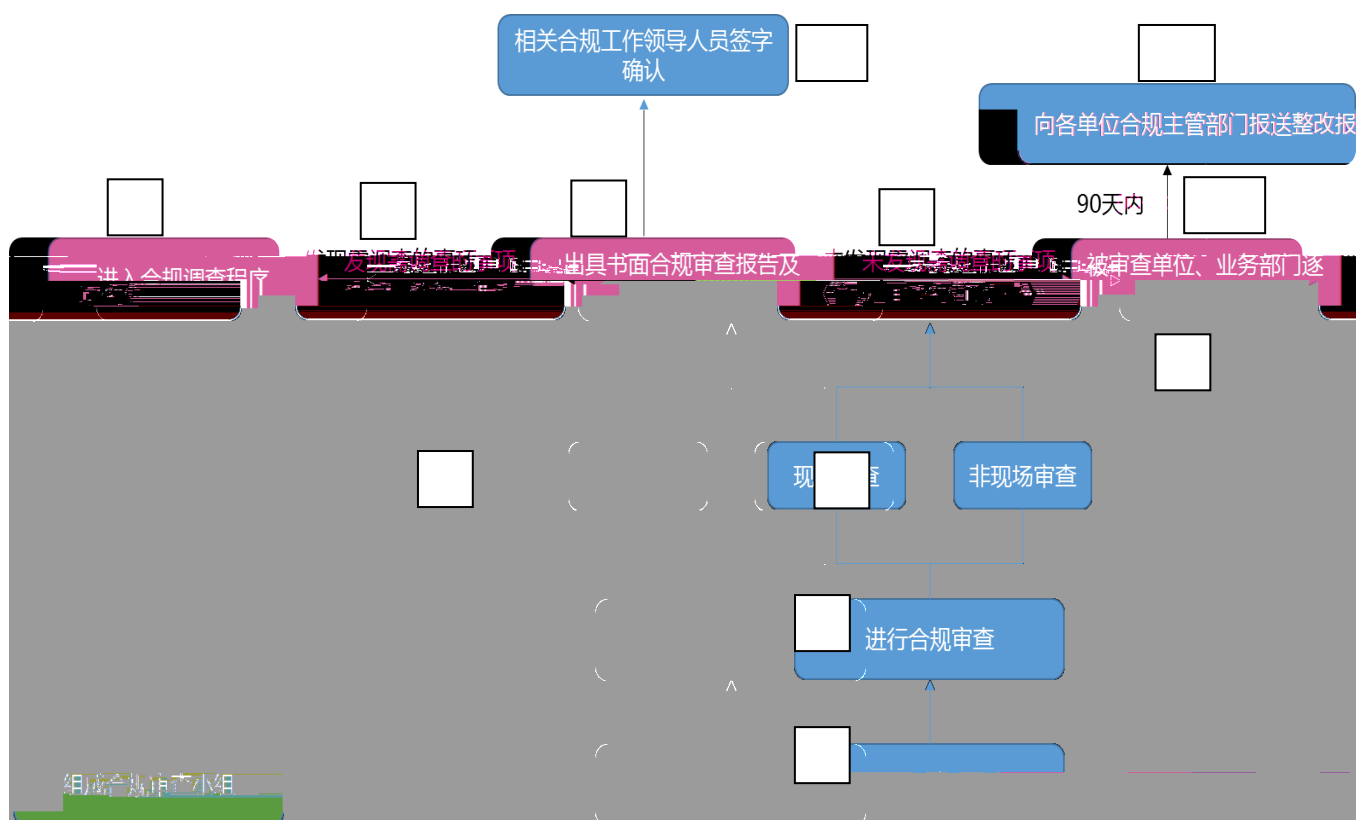
CHAPTER III. Record and File Management of Compliance Audit

Article 12.

CHAPTER IV. Punishment and Questions

Article 13.

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.



Compliance Interview Information Form

[illegible]

Compliance Interview Content Form

Interview Content Form	
Interviewing Matters:	

Subjects	Issues	Results	Any exceptions? If so, please briefly describe	Recommended rectifications	Notes
	1.1 Is there a Compliance Management Organization?				

Whether a Compliance Management Organization and personnel is in place and performing duties

	(monthly report, annual report, etc.) completed?				
	2.8 Is the compliance supervision for the compliance work process completed?				
	2.9 Are the answers and records of internal consultation completed?				
Response to Compliance Risk Assessment	3.1 Are compliance risk assessments conducted regularly?				
	3.2 Are effective measures taken against the results of compliance risk assessment?				
	3.3 What measures are taken to deal with different types of risks?				
	3.4 Are internal violations investigated?				
	3.5 Investigation Report and Result Report on Internal Violations				
	3.6 What measures are taken to deal with internal reporting?				
Compliance Training, Publicity and Implementation	4.1 Is the annual compliance training plan in accordance with the requirements of the higher authorities?				
	4.2 Are the training tasks given by the higher authorities and the management of the unit completed on time?				
	4.3 Is the compliance training record complete?				
	4.4 Does compliance training achieve the desired results?				
	4.5 Priority given by major management members to compliance policy implementation and relevant implementation records				
	4.6 Description and effect of compliance publicity and implementation towards partners and third parties				
Assessment of Compliance Work	5.1 Annual Assessment of Compliance Work				

Case Number	Violations Details	Accountable Person	Consequences/ Results	Applicable Rules for Determination of Nature of Violations	Evidence and Assessment Records (please specify if there is any attachment)	Solution Opinions	Remedy and Rectification Measures

Signature of Handling Person for Compliance Audit:

Signature of Leader of Compliance Management Leading Group/Chief

Compliance Officer:

Problems Spotted	Causes	Suggestions for Adjustment and Improvement	Reasons for Adjustment	Suggested Improvement Measures	Timeline for Improvement

Signature of Compliance Officer

Name:

Date: